

managementplans - AZWATER <managementplans@azwater.gov>

PHXAMA 4MP comments

Obenshain, Richard < RObenshain@epcor.com> To: "managementplans@azwater.gov" <managementplans@azwater.gov> Tue, Oct 22, 2019 at 10:54 AM

The MNPCCP comments also apply to 5MP...

EPCOR COMMENTS ON PROPOSED 4MP:

A: Under the proposed 4MP for MNPCCP-regulated providers, the BMP "point values" for education programs (2.1 adult & 2.2 youth) are set at 1 point each. Given that these programs- especially the youth program- are a significant portion of our conservation budget, have effects beyond the initial event, i.e. word-of-mouth, and often favorably impact residents outside the targeted service area, we would like to see the point values for BMP's 2.1 & 2.2 INCREASED to at least 2 points each.

Pursuant to ADWR clarifying the GPCD formulae:

- B: Under the proposed 4MP for GPCD-regulated providers, specifically our Chaparral City Water Co. system, we understand that the requirement for "Assigned Total GPCD Requirement" remains unchanged from the 3rd MP, at 249 gpcd.
- C: Under the proposed 4MP for GPCD-regulated providers, specifically the Johnson Utilities-PHX system, of which we are the Interim Manager, we understand that the requirement for "Assigned Total GPCD Requirement" remains unchanged from the 3rd MP, at 99 gpcd.



Rick Obenshain

Water Resource Analyst

EPCOR USA

2355 W. Pinnacle Peak Road, Suite 300

Phoenix, AZ 85027

O (623) 445-2416

F (623) 587-1044

epcor.com